

Gregory M. Fox, State Bar No. 070876  
Arlene C. Helfrich, State Bar No. 096461  
BERTRAND, FOX & ELLIOT  
The Waterfront Building - 2749 Hyde Street  
San Francisco, California 94109  
Telephone: (415) 353-0999  
Facsimile: (415) 353-0990

John A. Russo, City Attorney – State Bar No. 129729  
Randolph W. Hall, Assistant City Attorney – State Bar No. 080142  
OFFICE OF THE CITY ATTORNEY  
CITY OF OAKLAND  
One Frank H. Ogawa Plaza, 6<sup>th</sup> Floor  
Oakland, California 94612  
Telephone: (510) 238-3701  
Facsimile: (510) 238-6500

Kenneth Simoncini Esq.  
SIMMONCINI & ASSOCIATES

Attorneys for CITY OF OAKLAND, et al.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

OLEWASAMI BROWN,	)	<b>FILE: No. C-03-1141 TEH</b>
	)	
Plaintiff,	)	<b>STIPULATION AND <del>(PROPOSED)</del> ORDER</b>
vs.	)	<b>CONTINUING EXPERT DISCLOSURES</b>
	)	<b>AND BRIEFING SCHEDULE AND</b>
CITY OF OAKLAND, OFFICERS JOHN L.	)	<b>HEARING DATE FOR DISPOSITIVE</b>
GUTIERREZ, et al.,	)	<b>MOTION</b>
	)	
Defendants.	)	Honorable Thelton E. Henderson
_____	)	

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

The parties, acting by and through their respective legal counsel, stipulate to the following with regards to scheduling of any party's dispositive Motion For Summary Judgment and

respectfully request that the Court amend its pre-trial order regarding the filing date of dispositive motions and hearing date:

Good Cause exists for this Stipulation and Request for Order based on the Court's February 28, 2006 Order designating for disclosure certain OPD Internal Affairs Documents to be redacted by the Court and released to the parties subject to a stipulated protective order. The terms of the protective order have been agreed upon by the parties and submitted to the Court on March 9, 2006. The parties assume that the Court will produce the subject documents the week of March 13, 2006.

The Court's Pre-Trial Order required Plaintiff to disclose experts on March 23, 2006, and Defendants to disclose 15 days later; and, required dispositive motions to be filed by March 13, 2006 with a hearing date of April 17, 2006. Given the Court's Order Re: disclosure of certain IAD documents and in order to provide adequate time for the parties to incorporate this discovery into their dispositive motion papers, it is hereby stipulated as follows:

1. The parties have until March 23, 2006 to file their Motions for Summary Judgment, moved from the current due date of March 13, 2006. Opposition papers to be filed on or before April 10, 2006. Reply briefs to be filed on or before April 17, 2006.

2. The parties stipulate that these motions be heard May 1, 2006, moved from the current hearing date of April 17, 2006.

3. Plaintiff shall disclose expert witnesses April 3, 2006, and Defendants shall disclose experts April 18, 2006.

IT IS SO STIPULATED.

Dated: March \_\_\_\_\_, 2006

/s/  
\_\_\_\_\_  
RUSSELL A. ROBINSON  
Attorney for Plaintiff Olewasami Brown

Dated: March \_\_\_\_\_, 2006

/s/  
\_\_\_\_\_  
GREGORY M. FOX  
Attorney for Defendants City of Oakland et al.

1 BY STIPULATION OF THE PARTIES, IT IS SO ORDERED.

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3  
4 Dated: 03/15/06



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\_\_\_\_\_  
J. HENDERSON  
DISTRICT JUDGE

ATTORNEY ATTESTATION

I hereby attest that I have on file all holograph signatures for any signatures indicated by a  
“conformed” signature (/s/) within this efiled document.

/s/

\_\_\_\_\_  
GREGORY M. FOX